

“website” privacy policy



1. Data controller

The **Fondazione Centro di Musicologia Walter Stauffer**, whose office is registered in Cremona - Corso Garibaldi n. 178, VAT and tax code 00319130191, hereinafter referred to as the "**Controller**", guarantees compliance with regulations for the protection of personal data by providing the following information on data processing, pursuant to art. 13, EU Regulation 2016/679 (General Data Protection Regulation - GDPR) and subsequent amendments.



2. Data processed, purposes and legal bases for processing

2.1 Data generated by accessing the website

The IT systems and software procedures responsible for the operation of this website automatically acquire, during their normal operation, certain information whose transmission is implicit in the use of Internet communication protocols.

The information collected may include:

- domain names;
- internet protocol (IP) address;
- operating system used;
- type of browser and parameters of the device used to connect to the site;
- referring and exit web pages.

This information is processed automatically and collected exclusively in aggregate form in order to verify the proper functioning of the website and for security purposes.

The legal basis for the processing is the legitimate interest of the Data Controller.

2.2 Data recorded for security purposes

For security purposes (spam filters, firewalls, virus detection), automatically recorded data may also include personal data such as the IP address, which could be used, in accordance with applicable laws, to block attempts to damage the website itself or to cause harm to other users, or in any case to prevent harmful or criminal activities.

Such data are never used for user identification or profiling, but solely for the protection of the website and its users.

The legal basis for the processing is the legitimate interest of the Data Controller.

2.3 Data voluntarily provided by the user via the “Contact” and “Help desk” forms

The personal data provided by the user through the forms are collected and processed for the following purposes:

- a) to carry out user relationship activities based on contractual and/or pre-contractual agreements;
- b) for the occasional sending of informational emails about the Data Controller’s cultural activities (so-called “soft spam”);
- c) in the case of submitting a curriculum vitae, exclusively for recruitment purposes.

The legal basis for the processing is:

- with regard to the purposes under point 2.3 letters a) and c), the performance of a contract to which the data subject is party or the execution of pre-contractual measures taken at the request of the same;
- with regard to the purposes under point 2.3 letter b), the legitimate interest of the Data Controller.

For full transparency, we inform you that, in sending communications, the Data Controller uses the Mailchimp newsletter and email marketing platform, which, through statistical tracking systems (e.g., web beacons, pixels, etc.), allows for the detection of email openings, clicks on hyperlinks contained within the message, the IP address and browser used to open the email, and other similar details.

The collection of such data is necessary for the use of the platform and is an integral part of the message delivery system's functionalities.

For more information regarding Mailchimp’s GDPR compliance, click [here](#).



3. Nature of the provision

Except as specified for browsing data and data collected through contact forms, providing the data:

- with regard to the purposes referred to in point 2.3 letters a) and c) is mandatory, and any refusal will prevent the Data Controller from fulfilling the contractual or pre-contractual obligations undertaken;
- with regard to the purposes referred to in point 2.3 letter b) is optional, but any refusal will prevent the Data Controller from providing updates about its cultural activities.



4. Places and methods of processing and data retention periods

The data collected through the website are processed at the premises of the Data Controller, and at the data centers of the registrar Register Spa and the web hosting provider, both duly appointed as Data Processors. The data collected will be processed using electronic or otherwise automated, IT, and telematic tools, or through manual processing with logic strictly related to the purposes for which the personal data were collected, and in any case in a manner that ensures the security of the data.

The collected data, including those related to internet traffic, are stored for the time strictly necessary to manage the purposes for which the data are processed ("storage limitation principle," Art. 5, EU Regulation 2016/679) or in compliance with the deadlines established by applicable laws and legal obligations. After the storage period prescribed by law has expired, and unless otherwise directed by the Authority through an administrative or judicial order, the above-mentioned data will be destroyed and it will no longer be possible to obtain a copy.



5. Entities authorized to process data, supervision and communication of data

The processing of the collected data is carried out by internal personnel of the Data Controller specifically identified and authorized for processing, according to specific instructions issued in compliance with current regulations.

The data collected, within the limits relevant to the indicated processing purposes and where necessary or instrumental for the execution of such purposes, may be processed by third parties appointed as Data Processors (External Data Processors), or, depending on the case, by the same as independent Data Controllers, as well as disclosed to all parties necessary for the proper fulfillment of the purposes outlined in point 2.

The data collected may be provided, in response to legitimate requests and only in cases provided by law, to the Judicial Authority.

Under no circumstances and for no reason will your data be disseminated in any way.



6. Data transfer to non-EU countries

Data may be transferred abroad to non-European countries, and in particular to the United States, only after verifying the Standard Contractual Clauses adopted/approved by the European Commission pursuant to Article 46, paragraph 2, letters c) and d) of the GDPR, or binding corporate rules pursuant to Article 47 of the GDPR, or, in their absence, under one of the derogations provided for in Article 49 of the GDPR. Transfers to the United States are authorized based on the specific agreement called the EU-US Data Privacy Framework (available [here](#)), for which no further consent is required. Information regarding the use of data and GDPR compliance can be found at the following links:

- Google [here](#);
- Facebook e Instagram (Meta) [here](#);
- Linkedin [here](#) e [here](#);
- Google Analytics [here](#) e [here](#);
- Mailchimp [here](#).



7. Rights of the data subject

In relation to the personal data communicated, the data subject has the right to exercise the following:

- a. (Article 7.3 EU Regulation 679/2016 - GDPR) withdrawal of consent;
- b. (Article 15 EU Regulation 679/2016 - GDPR) right of access by the data subject;
- c. (Article 16 EU Regulation 679/2016 - GDPR) request rectification;
- d. (Article 17 EU Regulation 679/2016 - GDPR) request erasure ("right to be forgotten");
- e. (Article 18 EU Regulation 679/2016 - GDPR) right to restriction of processing;
- f. (Article 20 EU Regulation 679/2016 - GDPR) receive data in a structured format, commonly used and machine-readable, for the purpose of exercising the right to portability;
- g. (Article 21 EU Regulation 679/2016 - GDPR) objection to processing.

The subject can exercise her or his rights, as well as request more information relating to her or his personal data, by sending an e-mail to privacy@stauffer.org specifying the content of the request in the subject field.

Requests relating to the subject's rights will be processed without undue delay and, in any case, within one month of the request; only in cases of particular complexity or multiple requests can this deadline be extended by a further 2 (two) months.

We remind you that it is your right (pursuant to art. 77 of EU Regulation 679/2016 – GDPR) to lodge a complaint with the Guarantor for the Protection of Personal Data, whose contact details are available [here](#).

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